

September 13, 2017

**VIA E-MAIL**

Regional Freedom of Information Officer  
U.S. EPA, Region 9  
75 Hawthorne Street (OPA-2)  
San Francisco, CA 94105

**Re: Freedom of Information Act Request**

Dear EPA:

Pursuant to the Freedom of Information Act, I am writing to request a copy of the documents described in Section II below, which I believe to be held by your agency. I ask for a determination of this request within 20 days of receipt. If you conclude any of the requested information is exempt from disclosure, please provide the legal basis for the exemption in your response. If only some of the requested information is exempt from disclosure, please redact or withhold only the portion that you contend is exempt and make the rest available as requested.

If you need any clarification that will help expedite the request, please contact me at (310) 201-2100, ext. 236, or [nrin@birdmarella.com](mailto:nrin@birdmarella.com).

**I. Definitions**

The following definitions apply throughout this request:

- 1) “Plains” shall mean Plains All American Pipeline, L.P. and each of its successors, predecessors, parents, subsidiaries, officers, directors, managers, agents, employees, representatives, investigators, attorneys and anyone acting on its behalf.
- 2) “EPA,” “you,” or “your” shall mean the United States Environmental Protection Agency, and each of its successors, predecessors, parents,

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subsidiaries, officers, directors, managers, agents, employees, representatives, investigators, attorneys and anyone acting on its behalf.

- 3) “L901” shall mean Line 901, a 10.6-mile pipeline currently owned by Plains, which runs from Las Flores to Gaviota. Line 901 is referred to variously as Line 901, the 24”, the 24” line or the CA 24”, or the Las Flores to Gaviota line.
- 4) “L903” shall mean Line 903, a 128-mile pipeline currently owned by Plains, which runs from Gaviota to Kern County. Line 903 is referred to variously as Line 903, the 30”, the 30” line or the CA 30” .
- 5) “L901 release” shall mean the oil release that occurred in Santa Barbara County on May 19, 2015, from Line 901.
- 6) “Communications” means any conversation (whether in person or by telephonic, electronic, or other means), meeting, discussion, letter, memorandum, electronic mail message, web-site posting, note or other transfer or transmittal of information (in the form of facts, ideas, inquiries or otherwise), whether written, oral or by any other means and includes without limitation, any DOCUMENT which abstracts, digests, transcribes, memorializes or records any such communication.
- 7) “Document” has the same meaning as writing under Evidence Code § 250 and shall be construed in its broadest sense to include without limitation all writings and drawings of any kind whatsoever, including without limitation, all sketches, illustrative materials, correspondence, lists, notes, notations, memoranda, reports, summaries, diaries, transcripts, or charts, together with every tangible thing produced by handwriting, typewriting, printing, photocopying, photo offsetting, photography, microfilming, or by any tape, cassette, film, videotape, or disc recording, and all data or information stored on computer-readable media, such as electromagnetic or other disks, diskettes, hard disk drives, tapes, cartridges, micro- or flash drive, CD and DVD, including but not limited to, software, firmware, source code, electronic mail, web-site postings, and word processing documents. Each and every draft, annotated version, or otherwise non-identical copy of a Document is a separate Document for purposes of these Requests. A request for any document shall be deemed to include a request

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for any or all transmittal sheets, cover letters, exhibits, enclosures or attachments to such document, in addition to the document in its full and unexpurgated form.

- 8) “Relating” shall mean constituting, defining, evidencing, containing, describing, concerning, discussing, embodying, reflecting, analyzing, stating, referring to, dealing with, or pertaining to in any way.
- 9) Any words used in the singular form shall also embrace and be read and applied as the plural form, and vice versa.
- 10) The words “and” and “or” shall be construed conjunctively or disjunctively, whichever makes the request more inclusive.
- 11) The words “ANY” and “ALL” shall have the same meaning, and both mean each and every.

## **II. The Requests**

- 1) All draft and final incident reports relating to the L901 release.
- 2) All documents, materials, and records provided to Ed Ondak Environmental Services or GT Engineering relating to the L901 release.
- 3) All reports and records regarding any analyses conducted by Ed Ondak Environmental Services or GT Engineering relating to the L901 release.
- 4) All documents provided to or received from any laboratories relating to the L901 release.
- 5) All documents relating to any analyses conducted by any laboratories in connection with the L901 release.
- 6) All communications relating to oil samples taken in connection with the L901 release.
- 7) All documents provided to the attorneys, employees, personnel, representatives, or agents of the United States Attorney’s Office, the California Attorney General’s Office, the Santa Barbara County District Attorney’s Office, Unified Command, and their regional offices regarding the L901 release.

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- 8) Any information requests made by other non-governmental parties relating to the L901 release.

Sincerely,

A handwritten signature in black ink, appearing to read 'Naeun Rim', with a stylized, flowing script.

Naeun Rim

NR:nr

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